

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UGOCHUKWU GOODLUCK  
NWAUZOR, et al.,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

CASE NO. C17-5769 RJB

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CASE NO. C17-5806RJB

PROPOSED AGENDA FOR 10  
JANUARY 2020 CONFERENCE

The following is a proposed agenda for the preliminary pretrial conference on 10 January 2020:

- (1) Discussion of the separate claims of the Plaintiff State of Washington and the Class Plaintiffs, including the nature of evidence that is anticipated to be offered in support of those claims.

1 (2) Discussion of each of the claims and affirmative defenses of the Defendant, including the  
2 nature of evidence that is anticipated to be offered in support of those defenses.

3 (3) Discussion regarding the nature of work at issue.

4 (4) Discussion on damages and overlap - how and when to resolve damage issues, if  
5 necessary.

6 (5) Presentation of Evidence – parties are encouraged to work together.

7 (6) Oral argument on the State of Washington’s Motion to Strike GEO’s Jury Demand (Dkt.  
8 342).

9 (7) Plaintiffs’ Motion to Amend Notice Plan (Dkt. 209) to eliminate the direct mail  
10 component (which was originally contemplated only for those class members living in  
11 the United States)

- 12 • Class Plaintiffs and Defendant were notified on 31 December 2019 that the Court  
13 is considering (a) denying the motion (Dkt. 209) for potential class members who  
14 are currently held at the Northwest Detention Center or are otherwise known to be  
15 in ICE custody, (b) denying the motion (Dkt. 209) to have the Defendant pay for  
16 class notice, and (c) granting the Plaintiffs’ motion (Dkt. 209) to eliminate the  
17 direct mail notice component for remaining class members from the notice plan  
18 provided that the Plaintiffs demonstrate that notice will be sufficient.
- 19 • To that end, Class Plaintiffs and the Defendant were ordered on 31 December  
20 2019 to be prepared to discuss how notice will be disseminated to potential class  
21 members (who are not at the NWDC or in ICE custody) in the United States,  
22 including specific and detailed plans with deadlines, and plans to file proof that  
23 the deadlines have been met in the file;

- Opt-out date – we are less than 60 days from trial – can we still set the opt-out date for the day before trial begins? Must notice to class be completed before trial?

(8) Any other matters for discussion.

The Clerk is directed to send uncertified copies of this Order to all counsel of record, and to any party appearing *pro se* at said party's last known address.

Dated this 7<sup>th</sup> day of January, 2020.

A handwritten signature in black ink, reading "Robert J. Bryan", written over a horizontal line.

ROBERT J. BRYAN  
United States District Judge